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THE PRUDENTIAL INSURANCE COMPANY OF
AMERICA

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

JENNIFER SALA,

Plaintiff,

v.

THE PRUDENTIAL INSURANCE COMPANY
OF AMERICA; and DOES 1 THROUGH 10,
INCLUSIVE,

Defendants.

Case No. 2:20-cv-01786-JCM-DJA

**JOINT MOTION TO EXTEND FRCP 52
TRIAL DATE AND BRIEFING
SCHEDULE**

Plaintiff Jennifer Sala (“Plaintiff”) and Defendant The Prudential Insurance Company of America (“Prudential”) (collectively, the “Parties”), hereby move this Court for a two-week extension of the Rule 52 trial date and briefing schedule set forth in the Scheduling Order (ECF No. 29). In support of their motion, the Parties state as follows:

1. Plaintiff filed her Complaint on September 25, 2020. (ECF No. 1.) Prudential filed its Answer to the Complaint on November 18, 2020. (ECF No. 13.)

1 2. On December 18, 2020, the Court entered a Scheduling Order (ECF No. 21) setting
2 certain case deadlines, including a bench trial on cross-briefing pursuant to Fed. R. Civ. P. 52 on
3 September 17, 2021, with opening briefs due August 6, 2021 (6 weeks before trial), and responsive
4 briefs due August 27, 2021 (three weeks before trial). (ECF No. 21.)

5 3. On July 14, 2021, pursuant to the Parties' joint motion, the Court extended the bench trial
6 date on cross-briefing pursuant to Rule 52 until January 24, 2022 at 9:00 am, with opening briefs due
7 December 13, 2021 (6 weeks before trial) and response briefs due January 3, 2022 (3 weeks before
8 trial). (ECF No. 29.)

9 4. Since beginning briefing, the Parties have re-engaged in good-faith settlement
10 discussions and do not wish to incur the ongoing costs of litigation if they can resolve the case. A two-
11 week extension will allow the Parties to focus their time and energy on trying to resolve the case without
12 the need for Court involvement, but will not significantly impact the existing case deadlines.

13 5. Therefore, the Parties jointly request that the Court extend the bench trial date and FRCP
14 52 briefing schedule for two additional weeks, setting the following new schedule: bench trial on cross-
15 briefing pursuant to FRCP 52 on February 7, 2022, with opening briefs due December 27, 2021 (6
16 weeks before trial), and responsive briefs due January 18, 2022.

17 WHEREFORE, the Parties request that the Court extend the Rule 52 bench trial date and briefing
18 schedule by two weeks.

1 DATED: December 6, 2021

Respectfully submitted,

2 MCKENNON LAW GROUP PC

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3
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THE PRUDENTIAL INSURANCE
COMPANY OF AMERICA

10
11 IT IS SO ORDERED:

12
13
14 
UNITED STATES DISTRICT JUDGE

15 DATED: December 7, 2021

CERTIFICATE OF SERVICE

The undersigned hereby certifies that she electronically filed and served the foregoing document with the Clerk of the United States District Court for the District of Nevada using the CM/ECF system on this 6th day of December, 2021, which sent notification of such filing to all counsel of record, including the following:

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